

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JPMORGAN CHASE BANK, N.A.,

*Plaintiff,*

v.

BENJAMIN RIEVES,

*Defendant.*

CIVIL ACTION

FILE NO.: 1:24-cv-04913

**AFFIDAVIT OF ATTORNEYS' FEES AND COSTS**

STATE OF GEORGIA §

§

COUNTY OF FULTON §

BEFORE ME, the undersigned authority, on this day personally appeared Eva M. Spahn, who after being duly sworn, deposed and stated under oath as follows:

1. My name is Eva M. Spahn. I am over twenty-one years of age, of sound mind, and otherwise competent to make this affidavit. I have personal knowledge of the facts stated in this affidavit, and all such statements are true and correct.

2. I am an attorney licensed to practice law in the State of Georgia and in this District. Plaintiff JPMorgan Chase Bank, N.A. ("Chase") engaged my firm, Greenberg Traurig, LLP ("Greenberg Traurig"), to represent it in this action against

Defendant Benjamin Rieves (“*Defendant*”).

3. I am familiar with the fees customarily charged for legal services performed by attorneys who practice commercial litigation in Georgia state and federal courts, as well as the expenses and costs customarily incurred in connection with such litigation. I also am familiar with the time required to prosecute commercial litigation matters, including claims similar to those at issue in this case.

4. Chase has incurred attorneys’ fees totaling \$14,641.50 in connection with this action. This amount is reasonable and necessary based upon my education, training, and experience, as well as my assessment of the pleadings, timesheets, and billing summaries and my conversations with other attorneys working on this case. I have reviewed the redacted attorneys’ fee invoices that are collectively attached as **Exhibit B-1**, and they fairly and accurately set forth detailed descriptions of the services performed (redacted to protect applicable privileges), by whom, when, the reasonable amount of time required to perform such services, and the reasonable hourly rate and charges for each person performing the services.

5. The rates charged by Greenberg Traurig in this action are—in my professional opinion and based on my experience—reasonable and customary based on the skills, experience, and reputations of the respective attorneys who performed the work. Considering the types of claims at issue in this matter, attorneys’ fees totaling \$14,641.50 are reasonable and necessary. Chase has also incurred costs

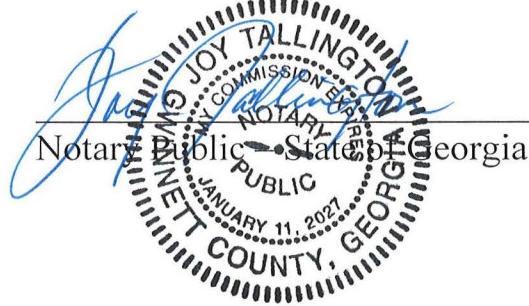
totaling \$430.00 in connection with this action. I have reviewed the fees, expenses, costs, and vendor bills submitted in this matter, and the \$430.00 total is comprised of filing and service fees.

6. Based on my experience, education, and training, the attorneys' fees and costs totaling \$15,071.50 sought by Chase in this matter are both reasonable and necessary.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Eva M. Spahn

SUBSCRIBED AND SWORN TO BEFORE ME on February 18, 2025.



# **EXHIBIT B-1**



Invoice No. [REDACTED]  
File No. [REDACTED]

Bill Date : November 5, 2024

JPMorgan Chase  
ELECTRONIC BILLING DO NOT MAIL  
10 South Dearborn, 20th Floor  
Chicago, IL 60603-2003

## INVOICE

Re: JPMorgan/ Chase v. Benjamin D Rieves  
Claim #:LIT24038001

Legal Services through October 31, 2024:

Total Fees: \$ 2,308.00

Expenses:

Filing Fees	405.00
Total Expenses:	\$ 405.00
<b>Current Invoice:</b>	<b>\$ 2,713.00</b>

PF:RKP  
[REDACTED]

**Important:** If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at [REDACTED]. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

**Note: Payment is Due 30 Days from Date of Invoice**

***FOR YOUR CONVENIENCE,  
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT  
FOR FEES & COSTS ARE AS FOLLOWS:***

TO: [REDACTED]

ABA #: [REDACTED]

CREDIT TO: GREENBERG TRAURIG ACCOUNT

ACCOUNT #: [REDACTED]

**PLEASE**

**REFERENCE:**

**CLIENT NAME:** JPMORGAN CHASE

**FILE NUMBER:** [REDACTED]

**INVOICE NUMBER:** [REDACTED]

**BILLING**

**PROFESSIONAL:** Paul Ferak

**IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:**

**Greenberg Traurig  
PO Box 936769  
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

\* If paying more than one invoice, please reference all invoice numbers in wiring instructions.

Please contact [REDACTED]@gtlaw.com for any payment related questions.

\*\*\*\*\*

Invoice No.: [REDACTED]  
 Re: JPMorgan/ Chase v. Benjamin D Rieves  
 Matter No.: [REDACTED]

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/12/24	Christina M. Carroll	Revise breach of contract claim for B. Rieves' fraud.	0.40	206.00
10/15/24	Christina M. Carroll	Revise complaint with additional language [REDACTED]	1.00	515.00
10/15/24	Morgan Jones	Review, analyze, and revise complaint against B. Rieves.	0.40	100.00
10/15/24	Morgan Jones	Review and analyze correspondence from/with client regarding [REDACTED]	0.50	125.00
10/16/24	Christina M. Carroll	Revise complaint against B. Rieves with comments from [REDACTED]	1.00	515.00
10/23/24	Eva M. Spahn	Revise draft complaint.	0.30	132.00
10/24/24	Morgan Jones	Finalize Complaint for filing (i.e., Review, analyze, and incorporate client's final revisions and comments (0.2).	0.20	50.00
10/24/24	Morgan Jones	Verify account balances in Complaints are accurate (0.1).	0.10	25.00
10/24/24	Morgan Jones	Review and analyze correspondence from client regarding [REDACTED]	0.10	25.00
10/24/24	Eva M. Spahn	Prepare civil cover sheet.	0.20	88.00
10/25/24	Morgan Jones	Strategy regarding [REDACTED]	0.20	50.00
10/28/24	Morgan Jones	[REDACTED] Correspond with client regarding [REDACTED]	0.20	50.00
10/28/24	Morgan Jones	Coordinate filing complaint and correspond with local counsel regarding the same.	0.30	75.00
10/28/24	Eva M. Spahn	Finalize complaint for filing and work on clerk issues related to processing same.	0.50	220.00
10/29/24	Eva M. Spahn	Work on corporate disclosure statement.	0.20	88.00
10/31/24	Eva M. Spahn	Analyze notice from court approving corporate disclosure statement.	0.10	44.00
<u>Total Time:</u>				5.70
<u>Total Fees:</u>				\$ 2,308.00

Invoice No.: [REDACTED]  
Re: JPMorgan/ Chase v. Benjamin D Rieves  
Matter No.: [REDACTED]

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/28/24	VENDOR: Hall, Heather INVOICE#: 69804 DATE: 10/29/2024 Filing Fee; 10/28/2024 JPMorgan Chase/Rieves - Filing Fee; Merchant: Georgia Northern District Court	\$ 405.00
	Total Expenses:	\$ 405.00



Invoice No.: [REDACTED]  
File No. [REDACTED]

Bill Date : December 3, 2024

JPMorgan Chase  
ELECTRONIC BILLING DO NOT MAIL  
10 South Dearborn, 20th Floor  
Chicago, IL 60603-2003

**INVOICE**

Re: JPMorgan/ Chase v. Benjamin D Rieves  
Claim #:LIT24038001

Legal Services through November 30, 2024:

Total Fees:	\$	2,121.00
<b>Current Invoice:</b>	<b>\$</b>	<b><u>2,121.00</u></b>

PF:EDL

**Important:** If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at [REDACTED]. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

**Note: Payment is Due 30 Days from Date of Invoice**

***FOR YOUR CONVENIENCE,  
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT  
FOR FEES & COSTS ARE AS FOLLOWS:***

TO: [REDACTED]

ABA #: [REDACTED]

CREDIT TO: GREENBERG TRAURIG ACCOUNT

ACCOUNT #: [REDACTED]

**PLEASE**

**REFERENCE:**

**CLIENT NAME:** JPMORGAN CHASE

**FILE NUMBER:** [REDACTED]

**INVOICE NUMBER:** [REDACTED]

**BILLING**

**PROFESSIONAL:** Paul Ferak

**IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:**

**Greenberg Traurig  
PO Box 936769  
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

\* If paying more than one invoice, please reference all invoice numbers in wiring instructions.

Please contact [REDACTED]@gtlaw.com for any payment related questions.

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Invoice No.: [REDACTED]  
 Re: JPMorgan/ Chase v. Benjamin D Rieves  
 Matter No.: [REDACTED]

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/28/24	Heather Hall	Finalizing and filing complaint and summons	0.60	150.00
10/28/24	Heather Hall	Telephone conference with Clerk regarding acceptance of new action and timing of issuance of permanent civil action number	0.10	25.00
10/29/24	Heather Hall	Finalizing and filing corporate disclosure statement	0.20	50.00
11/01/24	Heather Hall	Finalizing and electronically filing summons to B. Rieves	0.20	50.00
11/01/24	Carolyn Jones	Prepare a draft Corporate Disclosure statement and a draft Summons to be used in the Rieves matter.	0.60	135.00
11/01/24	Eva M. Spahn	Work on summons.	0.10	44.00
11/01/24	Eva M. Spahn	Correspondence with client regarding [REDACTED]	0.10	44.00
11/05/24	Morgan Jones	Review and analyze correspondence related to service and summons.	0.20	50.00
11/05/24	Morgan Jones	Strategy related t [REDACTED]	0.20	50.00
11/05/24	Eva M. Spahn	Strategize regarding [REDACTED]	0.20	88.00
11/06/24	Heather Hall	Email to process server R. George regarding service of process on B. Rieves	0.10	25.00
11/06/24	Morgan Jones	Analysis related t [REDACTED]	0.30	75.00
11/06/24	Eva M. Spahn	[REDACTED]		
11/07/24	Heather Hall	Correspondence related to service of process	0.10	44.00
11/07/24	Heather Hall	Telephone call from process server R. George regarding service of process on B. Rieves	0.20	50.00
11/07/24	Heather Hall	Email to process server R. George regarding additional address information for service of process on B. Rieves	0.10	25.00
11/07/24	Morgan Jones	Strategy related [REDACTED]	0.30	75.00
11/11/24	Christina M. Carroll	Confer with GT counsel regardin [REDACTED] f	0.20	103.00
11/11/24	Heather Hall	[REDACTED]		
11/12/24	Morgan Jones	Telephone conference with process server regarding service of process	0.20	50.00
11/13/24	Christina M. Carroll	Strategy regarding [REDACTED]	0.40	100.00
11/13/24	Heather Hall	Confer with GT team about service of process.	0.30	154.50
11/13/24	Heather Hall	Telephone conference with process server regarding status of service of process	0.20	50.00
11/13/24	Heather Hall	Emails to/from Ms. Jone, Ms. Spahn, and Ms. Carroll regarding [REDACTED]	0.20	50.00
11/13/24	Morgan Jones	Conferences with various businesses to determine Rieves' current place of employment (for purposes of effectuating service).	0.40	100.00
11/13/24	Morgan Jones	Analysis regarding the most effective way to effectuate service on Rieves (including [REDACTED]	1.00	250.00
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

Invoice No.: [REDACTED]  
Re: JPMorgan/ Chase v. Benjamin D Rieves  
Matter No.: [REDACTED]

Page 2

11/13/24	Morgan Jones	[REDACTED]	Analyze correspondence from process server and local counsel regarding service on Rieves.	0.20	50.00
11/13/24	Eva M. Spahn	[REDACTED]	Strategize regarding service of process on B. Rieves and process server request for additional information related to same.	0.20	88.00
11/20/24	Christina M. Carroll	[REDACTED]	Email with E. Spahn regarding [REDACTED]	0.10	51.50
11/20/24	Heather Hall	[REDACTED]	Reviewing and electronically filing return of service	0.20	50.00
11/20/24	Eva M. Spahn	[REDACTED]	Analyze proof of service and work on filing same.	0.10	44.00
				<u>Total Time:</u>	7.30
				<u>Total Fees:</u>	\$ 2,121.00

Invoice No.: [REDACTED]  
Re: JPMorgan/ Chase v. Benjamin D Rieves  
Matter No.: [REDACTED]

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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**No expenses charged to this file**



Invoice No [REDACTED]  
File No. : [REDACTED]

Bill Date : January 16, 2025

JPMorgan Chase  
ELECTRONIC BILLING DO NOT MAIL  
10 South Dearborn, 20th Floor  
Chicago, IL 60603-2003

## **INVOICE**

Re: JPMorgan/ Chase v. Benjamin D Rieves  
Claim #:LIT24038001

Legal Services through December 31, 2024:

Total Fees: \$ 2,642.50

Expenses:

Off-site Printing and Copying Charges	25.00
Total Expenses:	\$ 25.00
<b>Current Invoice:</b>	<b>\$ 2,667.50</b>

PF:RKP  
[REDACTED]

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**Note: Payment is Due 30 Days from Date of Invoice**

***FOR YOUR CONVENIENCE,  
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT  
FOR FEES & COSTS ARE AS FOLLOWS:***

TO: [REDACTED]

ABA #: [REDACTED]

CREDIT TO: GREENBERG TRAURIG ACCOUNT

ACCOUNT #: [REDACTED]

**PLEASE**

**REFERENCE:**

**CLIENT NAME:** JPMORGAN CHASE

**FILE NUMBER:** [REDACTED]

**INVOICE NUMBER:** [REDACTED]

**BILLING**

**PROFESSIONAL:** Paul Ferak

**IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:**

**Greenberg Traurig  
PO Box 936769  
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

\* If paying more than one invoice, please reference all invoice numbers in wiring instructions.  
Please contact [REDACTED] gtlaw.com for any payment related questions.

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Invoice No.: [REDACTED]  
 Re: JPMorgan/ Chase v. Benjamin D Rieves  
 Matter No.: [REDACTED]

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/04/24	Christina M. Carroll	Emails with GT team regarding [REDACTED] [REDACTED]	0.20	103.00
12/04/24	Christina M. Carroll	Email with client regarding [REDACTED] [REDACTED]	0.10	51.50
12/04/24	Heather Hall	Emails from/to M. Jones regarding [REDACTED] [REDACTED]	0.20	50.00
12/04/24	Heather Hall	Review docket to determine status of answer of Defendant Rieves.	0.20	50.00
12/04/24	Morgan Jones	Strategy regarding next steps.	0.40	100.00
12/04/24	Eva M. Spahn	Correspondence with team regarding [REDACTED] [REDACTED]	0.10	44.00
12/05/24	Heather Hall	Review docket to determine status of default.	0.20	50.00
12/05/24	Morgan Jones	Correspond with client regardin [REDACTED] [REDACTED]	0.20	50.00
12/05/24	Morgan Jones	Strategy regarding next step [REDACTED] [REDACTED]	0.40	100.00
12/05/24	Morgan Jones	Analyze docket to confirm Rieves did not file anything by his response deadline.	0.20	50.00
12/05/24	Eva M. Spahn	Correspondence with team regarding [REDACTED] [REDACTED] and next steps in obtaining default.	0.10	44.00
12/06/24	Heather Hall	Revise and file motion for entry of Clerk's default.	0.20	50.00
12/06/24	Eva M. Spahn	Draft motion for clerk's default.	0.30	132.00
12/11/24	Morgan Jones	Analyze clerk's entry of default.	0.20	50.00
12/11/24	Eva M. Spahn	Analyze clerk's default.	0.10	44.00
12/11/24	Eva M. Spahn	Correspondence with GT team regarding [REDACTED]	0.10	44.00
12/17/24	Heather Hall	Review docket to assist with motion for default judgment.	0.20	50.00
12/17/24	Eva M. Spahn	Correspondence with GT team regarding motion for default judgment.	0.20	88.00
12/20/24	Christina M. Carroll	Emails with GT team regarding default procedure and next steps.	0.20	103.00
12/20/24	Morgan Jones	Analyze wha [REDACTED] [REDACTED]	0.40	100.00
12/20/24	Morgan Jones	Analyze local rules related to default judgment procedure.	0.30	75.00
12/20/24	Morgan Jones	Conference with clerk regarding default judgment procedure.	0.30	75.00
12/20/24	Morgan Jones	Strategy/Analysis regardin [REDACTED] [REDACTED] [REDACTED].	0.70	175.00
12/20/24	Morgan Jones	Correspond with client regarding default judgment motion.	0.20	50.00
12/20/24	Eva M. Spahn	Work on issues related to default judgment, [REDACTED]	0.30	132.00
12/20/24	Eva M. Spahn	Analysis into local rules related to same (.20).	0.20	88.00

Invoice No.:

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Re: JPMorgan/ Chase v. Benjamin D Rieves

Matter No.:

12/23/24	Eva M. Spahn	Correspondence with M. Jones regarding motion for default judgment.	0.10	44.00
12/27/24	Morgan Jones	Draft brief in support of motion for default judgment.	1.20	300.00
12/27/24	Morgan Jones	Draft motion for default judgment.	1.40	350.00
		<u>Total Time:</u>	8.90	
		<u>Total Fees:</u>		\$ 2,642.50

Invoice No.: [REDACTED]  
Re: JPMorgan/ Chase v. Benjamin D Rievers  
Matter No.: [REDACTED]

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
11/13/24	VENDOR: TransUnion Risk & Alternative Data - ACH INVOICE#: 574224-202411-1 DATE: 12/1/2024 TruLookup Person Search - AdvancedBENJAMIN D RIEVES,DOB Search on 11/13/24 Req'd by/for Spagnoli, Rose	\$ 5.00
11/13/24	VENDOR: TransUnion Risk & Alternative Data - ACH INVOICE#: 574224-202411-1 DATE: 12/1/2024 TruLookup Comprehensive ReportBENJAMIN D RIEVES,32,ATLANTA,GA on 11/13/24 Req'd by/for Spagnoli, Rose	\$ 20.00
	Total Expenses:	\$ 25.00



Invoice No.: [REDACTED]  
File No.: [REDACTED]

Bill Date : February 6, 2025

JPMorgan Chase  
ELECTRONIC BILLING DO NOT MAIL  
10 South Dearborn, 20th Floor  
Chicago, IL 60603-2003

## INVOICE

Re: JPMorgan/ Chase v. Benjamin D Rieves  
Claim #:LIT24038001

Legal Services through January 31, 2025:

Total Fees:	\$	7,570.00
<b>Current Invoice:</b>	<b>\$</b>	<b>7,570.00</b>

PF:RKP

**Important:** If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at [REDACTED]. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

**Note: Payment is Due 30 Days from Date of Invoice**

***FOR YOUR CONVENIENCE,  
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT  
FOR FEES & COSTS ARE AS FOLLOWS:***

TO:

ABA #:

CREDIT TO:

ACCOUNT #:

**PLEASE**

**REFERENCE:**

[REDACTED]  
GREENBERG TRAURIG ACCOUNT

CLIENT NAME: JPMORGAN CHASE

FILE NUMBER: [REDACTED]

INVOICE NUMBER: [REDACTED]

BILLING

PROFESSIONAL: Paul Ferak

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

**Greenberg Traurig  
PO Box 936769  
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

\* If paying more than one invoice, please reference all invoice numbers in wiring instructions.  
Please contact [REDACTED] [@gtlaw.com](mailto:@gtlaw.com) for any payment related questions.

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Invoice No.: [REDACTED]  
 Re: JPMorgan/ Chase v. Benjamin D Rieves  
 Matter No.: [REDACTED]

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/25	Morgan Jones	Draft brief in support of motion for default judgment.	0.60	150.00
01/03/25	Morgan Jones	Draft motion for default judgment.	0.40	100.00
01/06/25	Morgan Jones	Draft brief in support of motion for default judgment.	2.50	625.00
01/06/25	Morgan Jones	Draft motion for default judgment.	0.30	75.00
01/06/25	Morgan Jones	Analyze [REDACTED] [REDACTED]	0.40	100.00
01/06/25	Morgan Jones	Analyze [REDACTED] [REDACTED]	1.60	400.00
01/06/25	Eva M. Spahn	Correspondence with GT team regarding [REDACTED] [REDACTED]	0.10	44.00
01/07/25	Morgan Jones	Draft email to client regarding [REDACTED] [REDACTED]	0.80	200.00
01/08/25	Christina M. Carroll	Revise motion for default and accompanying brief.	0.40	206.00
01/08/25	Christina M. Carroll	Email with M. Jones regarding [REDACTED]	0.10	51.50
01/08/25	Morgan Jones	Complete email to client regarding [REDACTED] [REDACTED]	0.30	75.00
01/08/25	Morgan Jones	Strategize with GT team regarding [REDACTED] [REDACTED]	0.50	125.00
01/08/25	Morgan Jones	Analyze [REDACTED] [REDACTED]	0.30	75.00
01/09/25	Christina M. Carroll	Confer with M. Jones and E. Spahn regarding [REDACTED].	0.30	154.50
01/09/25	Christina M. Carroll	Emails with client regarding [REDACTED]	0.30	154.50
01/09/25	Morgan Jones	Draft affidavit in support of motion for default judgment for execution by GT that proves-up attorneys' fees and costs.	0.40	100.00
01/09/25	Morgan Jones	Draft affidavit for execution by Chase that proves-up damages in support of motion for default judgment.	0.40	100.00
01/09/25	Morgan Jones	Strategy regarding [REDACTED] [REDACTED]	0.40	100.00
01/09/25	Morgan Jones	Revise email to client regarding [REDACTED] [REDACTED]	0.50	125.00
01/09/25	Morgan Jones	[REDACTED] Draft response to client email regarding	0.50	125.00

Invoice No.: [REDACTED]  
 Re: JPMorgan/ Chase v. Benjamin D Rieves  
 Matter No.: [REDACTED]

Page 2

01/09/25	Morgan Jones	Analyze correspondence from client regarding [REDACTED]	0.20	50.00
01/09/25	Morgan Jones	Revise brief in support of motion for default judgment to remove references to punitive damages.	0.60	150.00
01/09/25	Morgan Jones	Revise motion for default judgment [REDACTED]	0.30	75.00
01/09/25	Eva M. Spahn	Correspondences with client regarding [REDACTED]	0.20	88.00
01/09/25	Eva M. Spahn	Analyze issue of [REDACTED] and develop strategy regarding [REDACTED]	0.50	220.00
01/10/25	Morgan Jones	Analyze correspondence from client regarding [REDACTED]  [REDACTED]	0.40	100.00
01/10/25	Morgan Jones	Draft affidavit in support of motion for default judgment for execution by GT that proves-up attorneys' fees and costs.	0.90	225.00
01/10/25	Morgan Jones	Revise brief and motion in support of default judgment.	0.50	125.00
01/10/25	Morgan Jones	Draft affidavit for execution by Chase that proves-up damages in support of motion for default judgment.	0.80	200.00
01/13/25	Christina M. Carroll	Emails with team regarding [REDACTED]	0.30	154.50
01/13/25	Morgan Jones	Revise motion for default judgment to incorporate revisions and comments.	0.60	150.00
01/13/25	Eva M. Spahn	Revise and comment on motion for default judgment and brief in support of same.	0.80	352.00
01/14/25	Morgan Jones	Draft brief in support of motion for default judgment.	1.50	375.00
01/15/25	Heather Hall	Drafting notice of leave of absence for Ms. Spahn.	0.00	0.00
01/15/25	Morgan Jones	Analyze public records, Accurint Report, and TLO Report [REDACTED]  [REDACTED]	0.40	100.00
01/15/25	Morgan Jones	Revise brief in support of motion for default judgment.	2.00	500.00
01/15/25	Morgan Jones	Revise damages affidavits in support of motion for default judgment.	0.50	125.00
01/15/25	Morgan Jones	Revise motion for default judgment.	0.30	75.00
01/16/25	Morgan Jones	Revise brief in support of motion for default judgment.	0.40	100.00
01/16/25	Morgan Jones	Finalize analysis reports [REDACTED]	0.20	50.00
01/16/25	Morgan Jones	Draft email to client regarding [REDACTED]  [REDACTED]	0.40	100.00
01/16/25	Eva M. Spahn	Revise updated brief in support of motion for default judgment.	0.60	264.00
01/21/25	Heather Hall	Finalizing and electronically filing notice of leave of absence	0.00	0.00
01/22/25	Morgan Jones	Analyze correspondence from client regarding [REDACTED]	0.40	100.00
01/23/25	Christina M. Carroll	Revise final draft of default motion.	0.40	206.00

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01/23/25	Morgan Jones	Draft email to client regarding [REDACTED]	0.20	50.00
01/23/25	Morgan Jones	Revise default judgment filings to incorporate client revisions and comments.	0.70	175.00
01/24/25	Morgan Jones	Evaluate whether [REDACTED] [REDACTED]	0.50	125.00
01/29/25	Morgan Jones	Correspond with client regarding [REDACTED] [REDACTED]	0.30	75.00
01/30/25	Morgan Jones	Prepare default judgment filings for submission to Court.	0.40	100.00
01/30/25	Morgan Jones	Correspond with client regarding [REDACTED] [REDACTED]	0.10	25.00
01/31/25	Morgan Jones	Analyze current status of matter to prepare [REDACTED]	0.20	50.00
			<u>Total Time:</u>	26.70
			<u>Total Fees:</u>	\$ 7,570.00

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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**No expenses charged to this file**